

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
Revision of Part 15 of the Commission's Rules)	ET Docket 98-153
Regarding Ultra-Wideband Transmission)	
Systems)	

MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Pursuant to Section 1.48(b) of the Commission's Rules, XtremeSpectrum, Inc. hereby moves for leave to file an Opposition to Petitions for Reconsideration whose length exceeds the 25-page limit for such pleadings.¹

Grounds for Relief. XtremeSpectrum must respond to seven petitions for reconsideration that total 176 pages.² Each of the seven parties challenges specific rules that XtremeSpectrum advocated in the proceeding, and which it needs to carry on its business. Moreover, except for some limited commonality between Sprint Corp. and Cingular Wireless LLC, there is almost no overlap among these petitions. They raise substantially different legal and technical issues that bear on different frequency bands. XtremeSpectrum's opposition must address each of these issues in turn, and must provide legal and technical support where needed. (Also filed were another eight petitions, for 118 pages, that XtremeSpectrum does not oppose.³)

¹ 47 C.F.R. Sec. 1.429(f). Oppositions are due on July 31, 2002.

² Sprint Corp. (75 pages); Cingular Wireless LLC (27 pages); Qualcomm Inc. (13 pages); Sirius Satellite Radio Inc. and XM Radio Inc. (31 pages); Satellite Industry Ass'n (5 pages); Aeronautical Radio, Inc. and the Air Transport Ass'n of America, Inc. (9 pages); and Multispectral Solutions, Inc. (16 pages). These page counts exclude multiple and corrected filings, cover pages, and tables of contents.

³ Kohler Co.; Siemens VDO Automotive AG; Time Domain Corp.; American Gas Ass'n and American Public Gas Ass'n; National Utility Contractors Ass'n; British Airways; Ground Penetrating Radar Industry Coalition; and GPR Service Providers Coalition.

This proceeding has been one of the most contentious in recent memory, lasting 46 months with 976 filings in the docket (to date). Almost every aspect of the Commission's initial proposals was vigorously opposed and defended. Many of these same issues now figure in the reconsideration petitions, and are vital to XtremeSpectrum's interests.

CONCLUSION

Given the diversity and complexity of issues raised by multiple petitioners for reconsideration, simple fairness requires that XtremeSpectrum be permitted to respond in full, without the constraint of the page limit.

Respectfully submitted,

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